

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS (BOSTON)**

iROBOT CORPORATION,

Plaintiff,

v.

SHENZHEN ZHIYI TECHNOLOGY CO.,  
LTD., d/b/a iLIFE,

Defendant.

C.A. No. 1:17-cv-10652-LTS

**ASSENTED TO MOTION TO STAY BY DEFENDANT SHENZHEN ZHIYI  
TECHNOLOGY CO., LTD.**

Pursuant to 28 U.S.C. § 1659(a), Defendant Shenzhen Zhiyi Technology Co., Ltd.<sup>1</sup> (“Defendant”), with the assent of Plaintiff iRobot Corporation (“iRobot”), move this Court to stay this litigation. As grounds for this motion, Defendant states that iRobot filed a corresponding complaint with the United States International Trade Commission (“USITC”) alleging a violation of 19 U.S.C. § 1337 against Defendant. On May 17, 2017, the USITC instituted an investigation, captioned *Certain Robotic Vacuum Cleaning Devices and Components Thereof Such as Spare Parts*, Inv. No. 337-TA-1057 (“the Investigation”). The Investigation involves the same patents-in-suit and the same accused products that are involved in this litigation. Pursuant to 28 U.S.C. § 1659(a), Defendant is entitled to an automatic stay of this litigation.

Defendant expressly reserves all rights to file motions under Rule 12, and the parties are in agreement that the filing of this motion to stay shall not be argued as a basis for waiver of any Rule 12 motion filed after the stay is lifted following the USITC proceedings.

---

<sup>1</sup> The correct name of the named and served defendant is “Shenzhen ZhiYi Technology Co., Ltd.” as opposed to the name listed in the Complaint: “Shenzhen ZhiYi Technology Co., Ltd. d/b/a iLife.”

WHEREFORE, Defendant Shenzhen Zhiyi Technology Co., Ltd. requests that this Court stay this case until the Investigation results in a final determination.

Assented to by,

/s/ Stephen Marshall  
Stephen A. Marshall (BBO# 666200)  
FISH & RICHARDSON P.C.  
1425 K Street, NW Washington, DC 20005  
(202) 626-6414 smarshall@fr.com

Andrew G. Pearson (BBO# 688709)  
FISH & RICHARDSON P.C.  
One Marina Park Drive Boston, MA 02210  
(617) 542-5070 apearson@fr.com

Counsel for Plaintiff iRobot Corp.

Respectfully submitted,

/s/ Jacqueline E. Tambone  
Jacqueline E. Tambone (BBO #684479)  
Greenberg Traurig, LLP  
One International Place, Suite 2000  
Boston, M.A. 02110  
Telephone: (617) 310-6000  
Facsimile: (617) 310-6001  
tambonej@gtlaw.com

Mark G. Davis  
Ronald J. Pabis  
Patrick J. McCarthy  
Myomi T. Coad  
Greenberg Traurig, LLP  
2101 L Street, N.W., Suite 1000  
Washington, D.C. 20037  
Telephone: (202) 331-3100  
Facsimile: (202) 331-3101

Nicholas A. Brown  
Greenberg Traurig LLP  
4 Embarcadero Center  
Suite 3000  
San Francisco CA 94111  
Telephone: (415) 655-1271  
Facsimile: (415) 520-5609  
brownn@gtlaw.com

Jonathan Ball  
Greenberg Traurig, LLP  
MetLife Building  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 801-9200  
Facsimile: (212) 801-6400  
ballj@gtlaw.com

*Counsel for Shenzhen Zhiyi Technology Co., Ltd.*

Dated: June 22, 2017

**LOCAL RULE 7.1 CERTIFICATION**

I, Myomi T. Coad, do hereby certify that I have conferred with Plaintiff's counsel in good faith to resolve or narrow the issue.

/s/ Myomi T. Coad

**CERTIFICATE OF SERVICE**

I hereby certify pursuant to Federal Rules of Civil Procedure and L.R. 5.2 and 5.4 that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Jacqueline E. Tambone

NY 246601074v1